



OFFICE OF THE DISTRICT ATTORNEY
RICHMOND COUNTY

MICHAEL E. McMAHON
DISTRICT ATTORNEY

[REDACTED]
[REDACTED]
[REDACTED]

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[REDACTED]
[REDACTED]

[REDACTED]

With reference to the above-mentioned case, and pursuant to our continuing obligations, the People make the following disclosure:

On December 17, 2018, Police Officer Michael Lam received verbal instructions for an incomplete/improper memo book.

In 2013, Lieutenant Grigoriy Bardash was disciplined for an incident involving a license plate flipper. Details are set forth in the appended letter from ADA Ruggiero to Brad Foster, Esq. of the Legal Aid Society.

The People reserve the right to move *in limine* to preclude reference to this information, or otherwise to object to its use or introduction into evidence during trial.

Should you wish to discuss this matter, please do not hesitate to call me at [REDACTED] [REDACTED] during office hours.

Sincerely,

[REDACTED]
[REDACTED]

cc: Clerk of the Court